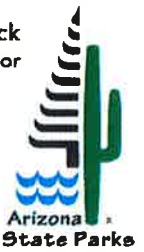




Doug Ducey
Governor

Sue Black
Executive Director



To: FCC
From: Arizona State Parks

To Whom It May Concern:

As a state agency that strives to conserve natural resources for recreation, visitation, and education; Arizona State Parks (ASP) operations are highly dependent on the real-time data from NOAA weather satellites, groundwater telemetry, and stream gauging stations. The data procured through NOAA is used to warn visitors, plan closures, and respond to weather events/threats. Groundwater telemetry offers ASP with consistent water level data used to plan park operations, respond to Arizona's drought, and manage park conservation efforts. Gauging station data is necessary to warn and respond to the dangers of flash floods. Given these systems' vulnerability to interference, the likelihood that the proposed FCC Ruling will result in an increase in spectrum users and use threatens ASP by disrupting and delaying critical forecasts, flood warning systems and hydrologic event data that could threaten the safety of State Park patrons and personnel. ASP is obligated, with the help of multiple agencies (i.e. ADWR, USGS, SRP, NWS, and counties), to use up-to-date environmental data to work with and insure the safety of the communities we serve using the same frequencies the FCC ruling sets to endanger.

Therefore, Arizona State Parks descends the FCC ruling on the grounds that increased users/use of spectrum pose a threat to public safety, conservation efforts, and park visitation. Although water is scarce in the Arizona desert it is vital, unpredictable, and dangerous. The only response to the unpredictability of flooding/weather system threats is the reliability of accurate and predictable data.

If this ruling is to pass, despite the potentially harmful impacts stated, Arizona State Parks needs assurance that state and local spectrum downlinks will be included in protected zones that minimize interference. Hazard alerts are critical to maintaining our mission to inform and protect ASP patrons and personnel. Protecting ASP from terrestrial-based interference in an increasingly connected world is crucial in serving the public in the present and especially in the future.

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